

# EXHIBIT 8

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

SEVEN NETWORKS, LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 2:17-cv-442-JRG  
Lead Case  
Jury Trial Demanded

SEVEN NETWORKS, LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS AMERICA, INC. AND  
SAMSUNG ELECTRONICS CO., LTD.,

Defendants.

Civil Action No. 2:17-cv-441-JRG  
Consolidated Case  
Jury Trial Demanded

**SEVEN NETWORKS, LLC'S NOTICE OF RULE 30(b)(6) DEPOSITION OF  
GOOGLE LLC ON VENUE-RELATED TOPICS**

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and the Local Rules of this Court, Plaintiff SEVEN Networks, LLC will take the oral deposition of one or more corporate representatives for Google LLC on the topics set forth in the attached Exhibit A. The deposition will begin at a date, time, and location mutually agreed upon by counsel for the parties, but early enough so as to allow the deposition(s) to be completed by February 22, 2018, and will continue from day to day (excluding weekends and legal holidays) until completed, or according to a mutually agreeable schedule. The deposition will be recorded by stenographic means and may be recorded by audio and/or videotape. The deposition will be conducted before an officer authorized to administer oaths.

Dated: February 10, 2018

Respectfully submitted,

*/s/ Nadia E. Haghighatian*

---

**Bruce S. Sostek**

State Bar No. 18855700

Bruce.Sostek@tklaw.com

**Max Ciccarelli**

State Bar No. 00787242

Max.Ciccarelli@tklaw.com

**Herbert J. Hammond**

State Bar No. 08858500

Herbert.Hammond@tklaw.com

**Richard L. Wynne Jr.**

State Bar No. 24003214

Richard.Wynne@tklaw.com

**J. Michael Heinlen**

State Bar No. 24032287

Michael.Heinlen@tklaw.com

**Adrienne E. Dominguez**

State Bar No. 00793630

Adrienne.Dominguez@tklaw.com

**Vishal Patel**

State Bar No. 24065885

Vishal.Patel@tklaw.com

**Nadia E. Haghighatian**

State Bar No. 24087652

Nadia.Haghighatian@tklaw.com

**Austin Teng**

State Bar No. 24093247

Austin.Teng@tklaw.com

**Matthew Cornelia**

State Bar No. 24097534

Matt.Cornelia@tklaw.com

**THOMPSON & KNIGHT LLP**

One Arts Plaza

1722 Routh St., Suite 1500

Dallas, Texas 75201

214.969.1700

214.969.1751 (Fax)

**ATTORNEYS FOR PLAINTIFF  
SEVEN NETWORKS, LLC.**

**Samuel F. Baxter**

Texas State Bar No. 01938000

sbaxter@mckoolsmith.com

**McKool Smith, P.C.**

104 E. Houston Street, Suite 300

Marshall, Texas 75670

Telephone: (903) 923-9000

Facsimile: (903) 923-9099

**Theodore Stevenson, III**

Texas State Bar No. 19196650

tstevenson@mckoolsmith.com

**Eric S. Hansen**

Texas State Bar No. 24062763

ehansen@mckoolsmith.com

**McKool Smith, P.C.**

300 Crescent Court, Suite 1500

Dallas, Texas 75201

Telephone: (214) 978-4000

Telecopier: (214) 978-4044

**ATTORNEYS FOR PLAINTIFF  
SEVEN NETWORKS, LLC.**

**CERTIFICATE OF SERVICE**

I certify that on February 10, 2018, I served the foregoing document, along with all exhibits and attachments, on counsel of record for Defendants via email.

/s/ Nadia E. Haghighatian

Nadia E. Haghighatian

## **EXHIBIT A**

### **DEFINITIONS**

1. “Google” refers to Google LLC and its officers, employees, agents, consultants, representatives, successors, assigns, and any other persons acting on behalf of Google LLC.
2. “Patents-in-Suit” refers to U.S. Patent Nos. 8,811,952; 9,247,019; 9,325,600; 9,351,254; 9,516,127; 9,516,129; 9,553,816; 8,078,158; 9,386,433; and 9,444,812.

### **TOPICS**

**TOPIC NO. 1:** Real property in the Eastern District of Texas that Google owned, leased, rented, used, or otherwise possessed or controlled between January 1, 2017, and August 22, 2017.<sup>1</sup> By way of example only, this topic includes: (i) description of the property; (ii) its location; and (iii) how Google used it.

**TOPIC NO. 2:** Agreements to which Google was a party that are related to the real property described in Topic No. 1.

**TOPIC NO. 3:** Physical personal property (i.e., property other than real or intellectual property) in the Eastern District of Texas that Google owned, leased, rented, used, or otherwise possessed or controlled between January 1, 2017, and August 22, 2017, including without limitation physical equipment that is part of Google’s Edge Network (i.e., the network described at <https://peering.google.com/#/> and <https://peering.google.com/#/infrastructure>). By way of example only, this topic includes: (i) description of the property; (ii) its location; (iii) how long it was located in the Eastern District of Texas; and (iv) how Google used it.

**TOPIC NO. 4:** Agreements to which Google was a party that refer or relate to the physical personal property described in Topic No. 3.

**TOPIC NO. 5:** Google’s decisions to: (i) create the Edge Network (for example, why Google thought the Edge Network infrastructure was important, how the Edge Network infrastructure complimented the remainder of Google’s infrastructure, and how the Edge Network infrastructure advanced Google’s business); and (ii) place Google’s edge nodes (Google Global Cache servers) in the Eastern District of Texas.

**TOPIC NO. 6:** Google employees who worked in the Eastern District of Texas between January 1, 2017, and August 22, 2017. By way of example only, this topic includes the employees’ names and titles and all locations in the District where they engaged in work for Google.

---

<sup>1</sup> If Google intends to argue that lack of activity before January 1, 2017, is in any way relevant to venue, then this topic, and the other topics using this date, should be read to seek information from August 22, 2012 (five years before the Amended Complaint was filed), to August 22, 2017.

**TOPIC NO. 7:** The terms and conditions of employment for Google's employees who worked in the Eastern District of Texas between January 1, 2017, and August 22, 2017. By way of example only, this topic includes employee agreements, employee handbooks, and other documents describing the employees' job-related responsibilities and obligations.

**TOPIC NO. 8:** Google's external marketing, advertising, promotional materials, web pages, or directory listings identifying Google's presence within the Eastern District of Texas between January 1, 2017, and August 22, 2017. By way of example only, this topic includes web pages identifying the location of Google's Edge Nodes within the Eastern District of Texas.

**TOPIC NO. 9:** The nature and type of information present on each piece of Google equipment located within the Eastern District of Texas between January 1, 2017, and August 22, 2017. By way of example only, this topic would include discussion of the above information on a month-by-month or other reasonable periodic basis, not to exceed quarterly.

**TOPIC NO. 10:** The nature, type, and amount of information sent from each piece of Google equipment located in the Eastern District of Texas to other equipment (including, but not limited to, computers, smartphones, and tablets) located in the Eastern District of Texas between January 1, 2017, and August 22, 2017.

**TOPIC NO. 11:** The process by which content is stored on and delivered through Google's equipment located in the Eastern District of Texas.

**TOPIC NO. 12:** Google's relationship with companies in the Eastern District of Texas with which Google was party to an agreement between January 1, 2017, and August 22, 2017, including but not limited to [REDACTED]

**TOPIC NO. 13:** Communications between Google and the companies identified in response to Topic No. 12.

**TOPIC NO. 14:** The services, hardware, and data that Google provided to the companies identified in response to Topic No. 12. By way of example only, this topic includes: (i) how Google provided the services, hardware, and data; (ii) the Google employees involved in providing such services, hardware, and data; and (iii) how Google understands such services, hardware, and data were used in the Eastern District of Texas.

**TOPIC NO. 15:** The operation of the Google Global Cache servers located in the Eastern District of Texas between January 1, 2017, until August 22, 2017, and (i) each time Google has accessed the servers to change settings, parameters, or the way in which the servers work, but not including access purely to add or remove data to the servers; (ii) all changes made to the servers; and (iii) the reasons the changes were made.

**TOPIC NO. 16:** Communications between ISPs and Google related to Google Global Cache servers located in the Eastern District of Texas.

**TOPIC NO. 17:** The date, and circumstances surrounding, when Google first downloaded, received, or otherwise obtained copies of the Patents-in-Suit, including without limitation adding the Patents-in-Suit to the Google Patents website.

**TOPIC NO. 18:** Google's mission "to organize the world's information and make it universally accessible and useful."

**TOPIC NO. 19:** Google's vision "to provide access to the world's information in one click."